

# Sacramento River Source Water Protection Program

## Comments on Secondary MCL Policy

### Presentation Outline



- Thank you to Regional Board Staff and CV-Salts for their efforts in understanding our concerns and developing solutions to address them
- Importance of SMCLs to human health and welfare
- Value of protecting source water quality
- Technical comments and concerns
- Key requests for further consideration

# Chapter 4 - Implementation

- We request a guidance document to assist Regional Board staff to conduct implementation of site-specific factors in WDRs
  - Input from Division of Drinking Water (DDW) and Potentially Impacted Community Water Systems



# Chapter 4 - Implementation

- 4<sup>th</sup> Bullet – Modify

- “The net effect of discharges that ~~affect~~ **improve** receiving water quality”

- 5<sup>th</sup> Bullet – Delete

- ~~“The presence or absence of other mineral (e.g., anion-cation balance) that may mitigate or aggravate aesthetic acceptability”~~

- 9<sup>th</sup> Bullet – Clarify

- “The practicality and feasibility of achieving compliance with the SMCLs at the point-of- discharge (including consideration of source control and pollution prevention programs, treatment alternatives, the cost for achieving compliance, the availability of alternative water supplies for drinking water, ability to pay, and other economic factors including the cost of non-compliance)”

# Chapter 4 - Implementation

- 12<sup>th</sup> Bullet – Modify
  - “Potential for the permitted discharge to affect the concentration of constituents identified in Tables 64449-A and 64449-B at downstream and downgradient ~~community water systems~~ **MUN designated water bodies** to ensure a safe drinking water supply for users”
- 13<sup>th</sup> Bullet – Expand
  - “Need for additional monitoring to track the net effect of permitted discharges at locations upgradient of downgradient well locations where groundwater is extracted for water supply and to determine the need for additional management requirements to protect the supply.”
- 16<sup>th</sup> Bullet – Modify
  - “Modeling and any **changes** ~~reduction~~ in contaminants due to **fate and transport** factors such as dilution and soil adsorption.”

# Chapter 4 - Implementation

- Consider Consultation with DDW and Potentially Impacted Community Water Systems
  - 8<sup>th</sup> Bullet –
    - “Evaluation of downstream or down-gradient community water system(s) to determine if a waiver under Title 22, section 64449.2 has been obtained or if the provisions of Title 22, section 64449.4 are being met.”
  - 9<sup>th</sup> Bullet –
    - Any evaluations determined to be related to drinking water systems
  - 10<sup>th</sup> Bullet –
    - “The ability of drinking water treatment processes to remove contaminants and the potential effect on drinking water treatment costs for downstream and down-gradient community water systems”
  - Additional Item –
    - The potential for an SMCL to have existing, new or pending human health information or regulatory threshold.

# Chapter 4 - Implementation

- Compliance – Item (a) - Clarify
  - “Compliance with the chemical constituent water quality objective may be determined using tests other than for “total”, such as methods using variations of filtered samples, where such methods have been analyzed for their appropriateness in representing the quality of treated drinking water...”

# Summary of Key Requests

- Provide for guidance document to assist Regional Board staff with implementation
- Clarify, Modify, Expand, or Delete selected factors
- Consider consultation with DDW and potentially impacted community water systems
- Clarify language in compliance to provide intent for “appropriateness”



# Contact Information for Sacramento River Source Water Protection Program

*Thank you for the opportunity to  
provide stakeholder input.*



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